

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MUNICIPAL DERIVATIVES ANTITRUST LITIGATION))))	MDL No. 1950
_____)	Master Docket No. 08-02516 (VM) (GWG)
THIS DOCUMENT RELATES TO:)	
)	
ALL ACTIONS)	
_____)	

**PLAINTIFFS' UNCONTESTED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT WITH DEFENDANTS TRINITY FUNDING CO., LLC, TRINITY PLUS
FUNDING CO., LLC, AND GE FUNDING CAPITAL MARKET SERVICES, INC.**

Plaintiffs hereby move for an Order granting preliminarily approval of a Settlement Agreement between Plaintiffs the City of Baltimore, MD, the Central Bucks School District, and the Bucks County Water & Sewer Authority (“Class Plaintiffs”), individually and on behalf of the putative class of purchasers in this action (the “Class”), and Defendants Trinity Funding Co., LLC, Trinity Plus Funding Co., LLC, and GE Funding Capital Market Services, Inc. (collectively, “GE” or “Defendants”).

Pursuant to the Settlement Agreement with GE, a copy of which is attached hereto as Exhibit 1, and as further detailed in the accompanying Memorandum of Law, GE has agreed to pay \$18.25 million, or with a potential opt out reduction, \$17.35 million, in exchange for dismissal of claims by the Class against GE in this litigation and releases. Additionally, GE has agreed to provide reasonable cooperation, including discovery cooperation, to benefit the Class in this litigation.

Therefore, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs respectfully request that the Court enter an Order:

(a) Preliminarily approving the Settlement Agreement;

- (b) Conditionally certifying the proposed Class as defined in the Settlement Agreement;
- (c) Appointing Interim Co-Lead Counsel as counsel for the Class pursuant to Fed. R. Civ. P. 23(g);
- (d) Staying the proceedings against GE in accordance with the terms of the Settlement Agreement; and
- (e) Granting such other and further relief as may be appropriate.

This Motion is supported by the Settlement Agreement; Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval, submitted herewith; the Declaration of Michael D. Hausfeld, submitted herewith; all pleadings filed in this case; and such additional evidence or argument as may be presented to the Court. This Motion is uncontested by GE.

Dated: December 6, 2013

Respectfully submitted,

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